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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HON. ROGER T. BENITEZ)

UNITED STATES OF AMERICA, Plaintiff, v. **JUAN GONZALEZ-RAMIREZ,** Defendant.	Criminal No. **08-CR-1093-BEN** Date: June 2, 2008 Time: 2:00 p.m. **NOTICE OF MOTIONS AND MOTIONS TO:** **1) COMPEL DISCOVERY; AND** **2) DISMISS INDICTMENT;** **3) LEAVE TO FILE FURTHER MOTIONS**

TO: KAREN HEWITT, UNITED STATES ATTORNEY, AND
PAUL STARITA, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on June 2, 2008 at 2:00 p.m., or as soon thereafter as counsel may be heard, the defendant, Juan Gonzalez-Ramirez by and through his counsel, Sylvia Baiz, will hereby move this Court for the above-entitled motions.

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MOTIONS

The defendant, Juan Gonzalez-Ramirez, by and through his attorney, Sylvia Baiz, and pursuant to Rules 12, 16, 24(a) of the Federal Rules of Criminal Procedure and Rules 404, 403, 609 of Federal Rules of Evidence any and all applicable local rules, hereby moves this Court to grant the following motions:

1) compel discovery;

2) dismiss the indictment;

3) leave to file further motions

These motions are based upon the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other evidence brought before this Court before or during the hearing on this motion.

Respectfully submitted,

/s/ Sylvia Baiz

Dated: May 28, 2008

SYLVIA BAIZ
Attorney for Defendant **Gonzalez-Ramirez**